

UNITED STATES DISTRICT COURT
for the
Northern District of Ohio

United States of America
v.

Case No.
1:22mj9279

ISAAC WOOLLEY

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 23, 2022 in the county of Cuyahoga in the
Northern District of Ohio, the defendant(s) violated:

Table with 2 columns: Code Section, Offense Description. Rows include Title 49, United States Code, Section 46314(a) and (b)(2); Title 18, United States Code, Section 2219; Title 18, United States Code, Section 32(a).

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet.

Sworn to via telephone after submission by reliable
electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1.

Date: November 27, 2022 at 5:27 p.m.

City and state: Cleveland, Ohio

Patrick B. Lentz
Complainant's signature

Patrick B. Lentz, Special Agent, FBI
Printed name and title

Jennifer Dowdell Armstrong
Judge's signature

Jennifer Dowdell Armstrong, Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR CRIMINAL COMPLAINT

I, Patrick B. Lentz (“your Affiant”), with the Cleveland Division of the Federal Bureau of Investigation, hereinafter referred to as the FBI, duly sworn do state the following:

STATEMENT OF FACTS

1. As a Special Agent of the FBI, your Affiant is an investigative law enforcement officer of the United States of America within the meaning of Title 18 U.S.C. § 2510(7). Your Affiant is empowered to conduct investigations and to make arrests for federal felony offenses.
2. Your Affiant has been employed by the Federal Bureau of Investigation since January 2007 and has been assigned to the Cleveland Division of the FBI since 2015. Your Affiant has been a member of several FBI Task Forces to include Violent Gang Task Force, Violent Crime Task Force, Drug Task Force and is currently a member of the Joint Terrorism Task Force since 2022. Your Affiant has sought and obtained Federal search warrants and have participated in hundreds of felony arrests. Your Affiant has been assigned to participate in investigations on the Joint Terrorism Task Force, which investigates matters involving international and domestic terrorism, threats of violence, explosives, firearm violations, and other criminal violations.
3. During that time, your Affiant has been assigned to investigate activities of drug trafficking organizations, drug-related gang and violent crime activities, firearms violations, white collar crime and other criminal offenses to include domestic terrorism. As a Special Agent of the FBI, your Affiant has participated in narcotics/drug enforcement and the dismantlement of mid to upper-level drug trafficking organizations. Your Affiant has planned and executed long-term investigative operations that have led to the disruption and dismantlement of high-level criminal street gangs whose revenues centered primarily on the trafficking and distribution of

illicit drugs. Your Affiant has been the case Agent for Federal investigation(s) into a violent street gang involved in illegal drug and firearms sales, racketeering and murder.

4. As a Special Agent in the FBI, your Affiant received basic training at the FBI Academy in Quantico, Virginia. Your Affiant has received field training and accrued practical experience by participating in all of the usual methods of investigation including, but not limited to, financial analysis, physical surveillance, cooperating witnesses, confidential human sources, telephone toll record analysis, interception of wire and cellular telephone communications, consensual monitoring, undercover operations, interview and interrogation techniques and the execution of search and arrest warrants.
5. This affidavit is being submitted in furtherance of an ongoing criminal investigation. It is based upon my own personal knowledge, my review of law enforcement reports, my discussions with other law enforcement agents and officers, and examination of available evidence. The information contained in this affidavit does not describe the entirety of this investigation but sets forth only those facts necessary to establish probable cause for the requested search.

PURPOSE OF AFFIDAVIT

6. This affidavit is made in support of a criminal complaint and an arrest warrant for ISAAC BENJAMIN WOOLLEY (hereafter WOOLLEY) for violating:
 - a. Title 18, United States Code, Section 32 (a)(3) and (5), damaging, destroying, and disabling the radar antenna tower, utilized by the Federal Aviation Administration (hereafter FAA) to monitor civilian and commercial air traffic at the Cleveland Hopkins International Airport, with the intent to endanger the safety of others or in reckless disregard for the safety of human life, to include those engaged in the authorized

operation of aircraft or an air navigation facility aiding in the navigation of such aircraft.

- b. Title 49, United States Code, Section 46314 (a) and (b)(2), knowingly and willfully entering, in violation of security requirements, the secure area of Cleveland Hopkins International Airport on November 23, 2022, with the intent to evade security procedures or restrictions.
- c. Title 18, United States Code, Section 2119, with intent to cause death or serious bodily harm, taking a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from a person by force and violence or by intimidation.

PROBABLE CAUSE

- 7. 18 USC § 32(a)(3) and (5) – Destruction of Aircraft or Aircraft Facilities, state in pertinent part:
 - a. Whoever willfully – (3) sets fire to, damages, destroys, or disables any air navigation facility, or interferes by force or violence with the operation of such facility, if such fire, damaging, destroying, disabling, or interfering is likely to endanger the safety of any such aircraft in flight; (5) interferes with or disables, with intent to endanger the safety of any person or with a reckless disregard for the safety of human life, anyone engaged in the authorized operation of such aircraft or any air navigation facility aiding in the navigation of any such aircraft;
 - i. shall be fined under this title or imprisoned not more than twenty years or both.
- 8. 8 USC § 2119 – Motor Vehicles (Carjacking) states in pertinent part:
 - a. Whoever, with the intent to cause death or serious bodily harm, takes a motor vehicle that has been transported, shipped, or received in interstate or foreign commerce from

the person or presence of another by force and violence or by intimidation, or attempts to do so, shall-- (1) be fined under this title or imprisoned not more than 15 years, or both.

9. 49 USC § 46314 – Entering Aircraft or airport Area in Violation of Security Requirements, states in pertinent part:

a. A person may not knowingly and willfully enter, in violation of security requirements prescribed under section 44901, 44903(b) or (c), or 44906 of this title, an aircraft or an airport area that serves an air carrier or foreign air carrier . . . (2) A person violating subsection (a) of this section with intent to evade security procedures or restrictions or with intent to commit, in the aircraft or airport area, a felony under a law of the United States or a State shall be fined under title 18, imprisoned for not more than 10 years, or both.

10. Security requirements prescribed under 49 USC § 44901 include “providing for the screening of all passengers and property, including United States mail, cargo, carry-on and checked baggage, and other articles, that will be carried aboard a passenger aircraft operated by an air carrier or foreign air carrier in air transportation or intrastate air transportation.

11. As set forth below, your Affiant believes WOOLLEY violated the aforementioned statutes through his intentional commission of the following acts on November 23, 2022:

12. At approximately 1917 Hours, security camera footage confirmed WOOLLEY unlawfully entered the premises of the Federal Aviation Administration (FAA) located in the Northern District of Ohio at 4829 Grayton Road 413, Cleveland, Ohio 44135. While on the premises, WOOLLEY caused damage to the main Cleveland Hopkins International Airport radar antenna tower. Specifically, WOOLLEY damaged a card reader/electrical switch controlling access to

the premises, the power box located at the top of the radar antenna tower, and disabled the power source to the tower. As a result of WOOLLEY's actions, the primary "asr-9" radar system, which is utilized by the FAA to monitor civilian and commercial air traffic for the Cleveland Hopkins International Airport was inoperable for a period of time. According to CDP, the FFA's back-up radar system was activated successfully after WOOLLEY disabled the primary system. The primary system remained inactive into November 24, 2022.

13. At approximately 2015 Hours, WOOLLEY was at or around the Centaur Apartments/Orbit Hotel, located in the Northern District of Ohio at 21200-21500 Brookpark Road, Fairview Park, Ohio 44126. While on the premises, WOOLLEY stole a vehicle identified as a white Volkswagen Tiguan SUV, Ohio License Plate JTL6903, belonging to an individual (hereafter CW1) located in Fairview Park, Ohio. Open source internet research revealed Volkswagen manufactured the 2019 Volkswagen Tiguan SUV in Germany and Mexico.
14. After the vehicle theft, CW1 was interviewed by officers with the Fairview Park Police Department (FPPD). CW1 stated s/he had recently moved in the Centaur Apartments and was out in his/her vehicle looking for a lost pet that evening. Upon observing movement along a tree line, CW1 left his/her vehicle, leaving the door open and vehicle running. CW1 then observed a male on foot walking quickly toward his/her vehicle. The male jumped into CW1's vehicle and attempted to drive off. CW1 jumped into the front passenger window in an attempt to stop the vehicle theft. CW1 stated the male accelerated the vehicle causing him/her to be thrown from the vehicle and onto the pavement. CW1 then chased the vehicle on foot, where s/he observed it travel west on Brookpark Road and then take a left turn onto NASA Parkway. As a result this incident, CW1 suffered non-life threatening injuries to her lower body which were treated at the scene by medical personnel. CW1 subsequently walked through the

incident with FPPD personnel. Based upon this walk through, CW1 was dragged by the vehicle for approximately 150 feet and s/he estimated a speed of 30 mph.

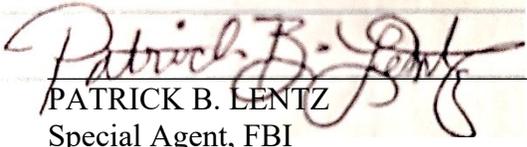
15. At approximately 2022 Hours, CDP officers were dispatched to Gate W9 at the Cleveland Hopkins International Airport for a vehicle breach. Dispatchers reported observing a white SUV breaching the gate and driving toward the Runway(s). Security camera footage later provided by CDP depicted a white Volkswagen Tiguan SUV breaching a gate at Cleveland Hopkins International Airport at approximately 2018 Hours. Updated information from CDP Dispatch revealed a male was observed running on the L6 Runway. Upon arrival, CDP officers observed a large hole in the gate and the wire fencing having been "peeled back." The officers followed the path of the vehicle, where they located an unoccupied and badly damaged 2019 Volkswagen Tiguan SUV, Ohio License Plate JTL6903, located in a "patch of grass" just off the Runway. Due to Woolley's actions, a decision was made by Cleveland Hopkins International Airport personnel to shut down the Runway(s) and suspend airport operations, causing several inbound flights to be diverted to other airports. Additionally, the CDP Airport Unit surged departmental resources and set a perimeter to protect Cleveland Hopkins International Airport from any further potential threats.
16. Thereafter, CDP and Brookpark Police Department (BPPD) personnel located WOOLLEY near Aerospace Drive and placed him into custody. Upon being taken into custody, WOOLLEY voluntarily admitted to stealing the vehicle from Fairview Park, Ohio, and driving through the gate/fencing at the Cleveland Hopkins International Airport.
17. CW1 accompanied FPPD personnel to the location where CDP and BPPD personnel detained WOOLLEY. After being asked for an in-person identification, CW1 positively identified WOOLLEY as the male who stole her vehicle.

18. BPPD personnel then transferred WOOLLEY into the custody of FPPD, where he was placed into a vehicle for transport. After being advised of his Miranda Rights, WOOLLEY stated he was a "veteran from overseas" and "wanted to make a statement for those who do not have a voice in society," before chuckling to himself. When asked if he thought the situation was funny, WOOLLEY stated he thought some people would think so. He then stated he wanted his children to have a good Thanksgiving and needed the vehicle to do so. While awaiting transport in the FPPD vehicle, a CDP officer's bodycam captured footage of WOOLLEY voluntarily admitting to breaching the airport gate/fencing, and also stating he was attempting to visit his family members in Athens, Alabama.

CONCLUSION

19. Based on the foregoing, your Affiant believes there is probable cause to arrest ISAAC BENJAMIN WOOLLEY for the following violations:
- a. Title 18, United States Code, Section 32 (a)(3) and (5), damaging, destroying, and disabling the radar antenna tower, utilized by the Federal Aviation Administration (hereafter FAA) to monitor civilian and commercial air traffic at the Cleveland Hopkins International Airport, with the intent to endanger the safety of others or in reckless disregard for the safety of human life, to include those engaged in the authorized operation of aircraft or an air navigation facility aiding in the navigation of such aircraft.
 - b. Title 49, United States Code, Section 46314 (a) and (b)(2), knowingly and willfully entering, in violation of security requirements, the secure area of Cleveland Hopkins International Airport on November 23, 2022, with the intent to evade security procedures or restrictions.

- c. Title 18, United States Code, Section 2119, taking a motor vehicle, with intent to cause death or serious bodily harm, that has been transported, shipped, or received in interstate or foreign commerce from a person by force and violence or intimidation.


PATRICK B. LENTZ
Special Agent, FBI

Sworn and subscribed to before
me this 27th day of November 2022 At 5:27 p.m.


JENNIFER DOWDWELL ARMSTRONG
UNITED STATES MAGISTRATE JUDGE